

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
GOVERNMENT EMPLOYEES' INSURANCE COMPANY,  
GEICO INDEMNITY COMPANY, GEICO GENERAL  
INSURANCE COMPANY and GEICO CASUALTY  
COMPANY,

**Case 1:22-cv-06713-  
ARR-RLM**

Plaintiffs,

**ANSWER**

- against -

RIAZ AHMAD, M.D., COMMUNITY MEDICAL CARE OF  
NY, P.C., COMFORT CARE MEDICAL PLLC, DLC  
COMPREHENSIVE MEDICAL, PLLC, AHMAD RIAZ,  
M.D., (AS A SOLE PROPRIETORSHIP), RIAZ AHMAD,  
M.D., (AS A SOLE PROPRIETORSHIP) and JOHN DOE  
DEFENDANTS "1" THROUGH "10",

Defendants.

-----X  
Defendants, AHMAD RIAZ, MD, COMMUNITY MEDICAL CARE OF NY, P.C., DLC  
COMPREHENSIVE MEDICAL, PLLC, AHMAD RIAZ, M.D., and RIAZ AHMAD, M.D.  
("Answering Defendants,"), by and through their attorney, Law Offices of Mark L. Furman, as and for  
their Answer to the Plaintiffs' Complaint ("Complaint") dated January 5, 2023, set forth as follows:

1. Neither admit nor deny the allegations contained in Paragraph 1 of the Complaint but refer this allegation to the Court for a determination of the characterization thereof as a matter of law.
2. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 2 of the Complaint.
3. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 3 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.
4. Deny the allegations in Paragraph 4 of the Complaint.
5. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 5 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

6. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 6 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

7. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 7 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

8. Defendants repeat and reallege their responses set forth in all prior Paragraph 8 of this Answer with the same force and effect as if fully set forth at length herein

9. Deny the allegations in Paragraph 9 of the Complaint.

10. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 10 of the Complaint.

11. Admits the allegations contained in the first sentence of Paragraph 11 of the Complaint and denies knowledge and information sufficient to form a belief as to the remaining allegations in Paragraph 11 of the Complaint.

12. Admits the allegations contained in the first sentence of Paragraph 12 of the Complaint and denies knowledge and information sufficient to form a belief as to the remaining allegations in Paragraph 12 of the Complaint.

13. Admits the allegations contained in the first sentence of Paragraph 13 of the Complaint and denies knowledge and information sufficient to form a belief as to the remaining allegations in Paragraph 13 of the Complaint.

14. Admits the allegations contained in the first sentence of Paragraph 14 of the Complaint and denies knowledge and information sufficient to form a belief as to the remaining allegations in Paragraph 14 of the Complaint.

15. Admits the allegations contained in the first two sentences of Paragraph 15 of the Complaint and denies knowledge and information sufficient to form a belief as to the remaining allegations in Paragraph 15 of the Complaint.

16. Admits the allegations contained in the first two sentence of Paragraph 16 of the Complaint and denies knowledge and information sufficient to form a belief as to the remaining allegations in Paragraph 16 of the Complaint.

17. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 17 of the Complaint.

18. Neither admit nor deny the allegations contained in Paragraph 18 of the Complaint but refer this allegation to the Court for a determination of the characterization thereof as a matter of law.

19. Neither admit nor deny the allegations contained in Paragraph 19 of the Complaint but refer this allegation to the Court for a determination of the characterization thereof as a matter of law.

20. Neither admit nor deny the allegations contained in Paragraph 20 of the Complaint but refer this allegation to the Court for a determination of the characterization thereof as a matter of law.

21. Neither admit nor deny the allegations contained in Paragraph 21 of the Complaint but refer this allegation to the Court for a determination of the characterization thereof as a matter of law.

22. Neither admit nor deny the allegations contained in Paragraph 22 of the Complaint but refer this allegation to the Court for a determination of the characterization thereof as a matter of law.

23. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 23 of the Complaint.

24. The allegations in Paragraph 24 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

25. The allegations in Paragraph 25 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

26. The allegations in Paragraph 26 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny

those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

27. The allegations in Paragraph 27 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

28. The allegations in Paragraph 28 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

29. The allegations in Paragraph 29 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

30. The allegations in Paragraph 30 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

31. The allegations in Paragraph 31 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

32. The allegations in Paragraph 32 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

33. The allegations in Paragraph 33 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

34. The allegations in Paragraph 34 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

35. The allegations in Paragraph 35 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

36. The allegations in Paragraph 36 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

37. The allegations in Paragraph 37 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

38. The allegations in Paragraph 38 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

39. The allegations in Paragraph 39 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny

those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

40. The allegations in Paragraph 40 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

41. The allegations in Paragraph 41 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

42. The allegations in Paragraph 42 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

43. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 43 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

44. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 44 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

45. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 45 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

46. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 46 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

47. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 47 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

48. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 48 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

49. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 49 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

50. Deny the allegations in Paragraph 50 of the Complaint.

51. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 51 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

52. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 52 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

53. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 53 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

54. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 54 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

55. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 55 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

56. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 56 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

57. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 57 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

58. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 58 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

59. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 53 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

60. Deny the allegations in Paragraph 60 of the Complaint.

61. Deny the allegations in Paragraph 61 of the Complaint.

62. Deny the allegations in Paragraph 62 of the Complaint.

63. Deny the allegations in Paragraph 63 of the Complaint.

64. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 64 of the Complaint.

65. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 65 of the Complaint.

66. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 66 of the Complaint.

67. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 67 of the Complaint.

68. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 68 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.



69. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 69 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

70. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 70 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

71. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 71 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

72. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 72 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

73. Deny the allegations in Paragraph 73 of the Complaint.

74. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 74 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

75. Deny the allegations in Paragraph 75 of the Complaint.

76. Deny the allegations in Paragraph 76 of the Complaint.

77. Deny the allegations in Paragraph 77 of the Complaint.

78. Deny the allegations in Paragraph 78 of the Complaint.

79. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 79 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

80. Deny the allegations in Paragraph 80 of the Complaint.

81. Deny the allegations in Paragraph 81 of the Complaint.

82. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 82 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

83. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 83 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

84. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 84 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

85. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 85 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

86. Deny the allegations in Paragraph 86 of the Complaint.

87. Deny the allegations in Paragraph 87 of the Complaint.

88. Deny the allegations in Paragraph 88 of the Complaint.

89. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 89 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

90. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 90 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

91. The allegations in Paragraph 91 of the Complaint state legal conclusions or purport to interpret the Insurance law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

92. Neither admit nor deny the allegations contained in Paragraph 92 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the

characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

93. Neither admit nor deny the allegations contained in Paragraph 93 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

94. Neither admit nor deny the allegations contained in Paragraph 94 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

95. Neither admit nor deny the allegations contained in Paragraph 95 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

96. Neither admit nor deny the allegations contained in Paragraph 96 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

97. Neither admit nor deny the allegations contained in Paragraph 97 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

98. Neither admit nor deny the allegations contained in Paragraph 98 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

99. Neither admit nor deny the allegations contained in Paragraph 99 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

100. Deny the allegations in Paragraph 100 of the Complaint.

101. Deny the allegations in Paragraph 101 of the Complaint.

102. Deny the allegations in Paragraph 102 of the Complaint.

103. Neither admit nor deny the allegations contained in Paragraph 103 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

104. The allegations in Paragraph 33 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

105. Deny the allegations in Paragraph 105 of the Complaint.

106. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 106 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

107. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 107 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

108. Deny the allegations in Paragraph 108 of the Complaint.

109. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 109 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

110. Deny the allegations in Paragraph 110 of the Complaint.

111. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 111 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

112. Deny the allegations in Paragraph 112 of the Complaint.

113. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 113 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

114. Deny the allegations in Paragraph 114 of the Complaint.

115. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 115 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

116. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 116 of the Complaint.

117. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 117 of the Complaint.

118. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 118 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

119. Deny the allegations in Paragraph 119 of the Complaint.

120. Deny the allegations in Paragraph 120 of the Complaint.

121. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 121 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

122. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 122 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

123. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 121 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

124. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 124 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

125. Deny the allegations in Paragraph 125 of the Complaint.

126. Neither admit nor deny the allegations contained in Paragraph 126 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

127. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 127 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

128. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 128 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

129. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 129 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

130. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 130 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

131. Deny the allegations in Paragraph 133 of the Complaint.

132. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 132 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

133. Deny the allegations in Paragraph 133 of the Complaint.

134. Deny the allegations in Paragraph 134 of the Complaint.

135. Deny the allegations in Paragraph 135 of the Complaint.

136. Deny the allegations in Paragraph 136 of the Complaint.

137. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 137 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

138. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 138 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

139. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 139 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

140. Deny the allegations in Paragraph 140 of the Complaint.

141. Deny the allegations in Paragraph 141 of the Complaint.

142. Deny the allegations in Paragraph 142 of the Complaint.

143. Deny the allegations in Paragraph 143 of the Complaint.

144. Deny the allegations in Paragraph 144 of the Complaint.

145. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 145 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

146. Neither admit nor deny the allegations contained in Paragraph 146 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

147. Neither admit nor deny the allegations contained in Paragraph 147 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny

that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

148. Neither admit nor deny the allegations contained in Paragraph 148 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

149. Neither admit nor deny the allegations contained in Paragraph 149 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

150. Neither admit nor deny the allegations contained in Paragraph 150 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

151. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 151 of the Complaint.

152. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 152 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

153. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 153 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

154. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 154 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

155. Deny the allegations in Paragraph 157 of the Complaint.



156. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 153 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

157. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 157 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

158. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 158 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

159. Deny the allegations in Paragraph 159 of the Complaint,

160. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 160 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

161. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 161 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

162. The allegations in Paragraph 162 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

163. Neither admit nor deny the allegations contained in Paragraph 163 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

164. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 164 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

165. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 165 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

166. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 166 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

167. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 167 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

168. Deny the allegations in Paragraph 168 of the Complaint.

169. Deny the allegations in Paragraph 169 of the Complaint,

170. Deny the allegations in Paragraph 170 of the Complaint,

171. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 171 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied

172. Neither admit nor deny the allegations contained in Paragraph 172 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

173. Neither admit nor deny the allegations contained in Paragraph 173 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

174. Neither admit nor deny the allegations contained in Paragraph 174 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny

that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

175. Neither admit nor deny the allegations contained in Paragraph 175 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

176. Neither admit nor deny the allegations contained in Paragraph 176 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

177. Neither admit nor deny the allegations contained in Paragraph 177 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

178. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 178 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

179. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 179 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

180. Deny the allegations in Paragraph 180 of the Complaint.

181. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 181 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied,

182. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 182 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

183. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 183 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

184. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 184 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

185. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 185 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied. Deny the allegations in Paragraph 181 of the Complaint,

186. Deny the allegations in Paragraph 186 of the Complaint,

187. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 187 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

188. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 188 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

189. Deny the allegations in Paragraph 189 of the Complaint.

190. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 190 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

191. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 191 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

192. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 192 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

193. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 193 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

194. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 194 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

195. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 195 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

196. Deny the allegations in Paragraph 196 of the Complaint.

197. Deny the allegations in Paragraph 197 of the Complaint.

198. Deny the allegations in Paragraph 198 of the Complaint.

199. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 199 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

200. Neither admit nor deny the allegations contained in Paragraph 200 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

201. Deny the allegations in Paragraph 201 of the Complaint.

202. Neither admit nor deny the allegations contained in Paragraph 202 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

203. Neither admit nor deny the allegations contained in Paragraph 203 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny

that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

204. The allegations in Paragraph 204 of the Complaint state legal conclusions or purport to interpret the “Worker’s Compensation law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

205. Deny the allegations in Paragraph 205 of the Complaint.

206. Deny the allegations in Paragraph 206 of the Complaint.

207. Deny the allegations in Paragraph 207 of the Complaint.

208. Deny the allegations in Paragraph 208 of the Complaint.

209. Deny the allegations in Paragraph 209 of the Complaint.

210. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 210 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

211. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 211 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

212. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 212 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

213. Deny the allegations in Paragraph 213 of the Complaint.

214. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 214 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

215. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 215 of the Complaint.

216. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 216 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

217. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 217 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

218. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 218 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

219. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 219 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

220. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 220 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

221. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 211 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

222. Deny the allegations in Paragraph 222 of the Complaint.

223. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 223 of the Complaint.

224. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 224 of the Complaint.

225. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 225 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

226. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 226 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

227. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 227 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

228. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 228 of the Complaint.

229. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph of the Complaint.

230. Deny the allegations in Paragraph 230 of the Complaint.

231. Deny the allegations in Paragraph 231 of the Complaint.

232. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 232 of the Complaint.

233. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 233 of the Complaint.

234. Deny the allegations in Paragraph 234 of the Complaint.

235. Deny the allegations in Paragraph 235 of the Complaint.

236. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 236 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

237. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 237 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

238. Deny the allegations in Paragraph 238 of the Complaint.



239. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 239 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

240. Deny the allegations in Paragraph 240 of the Complaint.

241. Deny the allegations in Paragraph 241 of the Complaint.

242. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 242 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

243. Deny the allegations in Paragraph 243 of the Complaint.

244. Neither admit nor deny the allegations contained in Paragraph 244 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

245. Neither admit nor deny the allegations contained in Paragraph 245 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

246. Neither admit nor deny the allegations contained in Paragraph 246 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

247. Neither admit nor deny the allegations contained in Paragraph 247 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

248. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 248 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

249. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 249 of the Complaint.

250. Deny knowledge or information sufficient to form a belief as to the allegations in Paragraph 250 of the Complaint.

251. Neither admit nor deny the allegations contained in Paragraph 251 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

252. Neither admit nor deny the allegations contained in Paragraph 252 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

253. Neither admit nor deny the allegations contained in Paragraph 253 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

254. Neither admit nor deny the allegations contained in Paragraph 254 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

255. Neither admit nor deny the allegations contained in Paragraph 255 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

256. Neither admit nor deny the allegations contained in Paragraph 256 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

257. Deny the allegations in Paragraph 257 of the Complaint.

258. Deny the allegations in Paragraph 258 of the Complaint.

259. Deny the allegations in Paragraph 259 of the Complaint.

260. Neither admit nor deny the allegations contained in Paragraph 260 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

261. Neither admit nor deny the allegations contained in Paragraph 261 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

262. Neither admit nor deny the allegations contained in Paragraph 262 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

263. Neither admit nor deny the allegations contained in Paragraph 263 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

264. Deny the allegations in Paragraph 264 of the Complaint.

265. Neither admit nor deny the allegations contained in Paragraph 265 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny

that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

266. Deny the allegations in Paragraph 266 of the Complaint.

267. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 267 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied..

268. Deny the allegations in Paragraph 268 of the Complaint.

269. Neither admit nor deny the allegations contained in Paragraph 269 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

270. Neither admit nor deny the allegations contained in Paragraph 270 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

271. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 271 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

272. Neither admit nor deny the allegations contained in Paragraph 272 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

273. Neither admit nor deny the allegations contained in Paragraph 273 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

274. Neither admit nor deny the allegations contained in Paragraph 274 of the Complaint because they comprise specific medical and/or scientific principles and are not factual allegations, but deny that the characterization of same by Plaintiffs in said Paragraph is complete or accurate when considered in the context of this case.

275. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 275 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

276. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 276 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

277. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 277 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

278. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 278 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

279. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 279 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

280. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 280 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

281. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 271 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

282. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 282 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

283. The allegations in Paragraph 283 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

284. The allegations in Paragraph 284 of the Complaint state legal conclusions or purport to interpret the “no fault” law and related statutes and caselaw, and as such Defendants neither admit nor deny those allegations but refer the Court to the meaning and import of a complete recitation of the written text of same.

285. Deny the allegations in Paragraph 285 of the Complaint.

286. Deny the allegations in Paragraph 286 of the Complaint.

287. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 287 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

288. Deny the allegations in Paragraph 288 of the Complaint.

289. Deny the allegations in Paragraph 289 of the Complaint.

290. Deny the allegations in Paragraph 290 of the Complaint.

291. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 291 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

292. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 292 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

293. Deny the allegations in Paragraph 293 of the Complaint.

294. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 294 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

295. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 295 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

296. Deny the allegations in Paragraph 296 of the Complaint.

297. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 297 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

298. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 298 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

299. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 299 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

300. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 295 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

301. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 301 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

302. Deny the allegations in Paragraph 302 of the Complaint.

303. Deny the allegations in Paragraph 303 of the Complaint.

304. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 304 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

305. Deny the allegations in Paragraph 305 of the Complaint.

306. Deny the allegations in Paragraph 306 of the Complaint.

307. Neither admit nor deny the allegations contained in Paragraph 307 of the Complaint but refer this allegation to the Court for its determination of the allegations thereof as a matter of law.

308. Deny the allegations in Paragraph 308 of the Complaint.

309. Deny the allegations in Paragraph 309 of the Complaint.

310. Deny the allegations in Paragraph 310 of the Complaint.

311. Deny the allegations in Paragraph 311 of the Complaint.

312. Deny the allegations in Paragraph 312 of the Complaint.

313. Deny the allegations in Paragraph 313 of the Complaint.

314. Deny the allegations in Paragraph 314 of the Complaint.

315. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 315 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

316. Deny the allegations in Paragraph 316 of the Complaint.

**ANSWERING THE FIRST CAUSE OF ACTION**

317. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

318. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 318 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

319. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 319 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

320. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 320 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.



321. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 321 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

322. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 322 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

323. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 323 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE SECOND CAUSE OF ACTION**

324. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

325. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 325 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

326. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 326 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

327. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 327 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

328. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 328 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

329. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 329 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

330. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 330 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE THIRD CAUSE OF ACTION**

331. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

332. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 325 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

333. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 326 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

334. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 327 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

335. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 328 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

336. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 329 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

337. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 337 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

338. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 338 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE FOURTH CAUSE OF ACTION**

339. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

340. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 340 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

341. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 341 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

342. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 342 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

343. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 343 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

344. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 344 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

345. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 345 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE FIFTH CAUSE OF ACTION**

346. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

347. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 347 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

348. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 348 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

349. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 349 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

350. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 350 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

351. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 351 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE SIXTH CAUSE OF ACTION**

352. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

353. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 353 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

354. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 354 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

355. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 355 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

356. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 356 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

357. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 357 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

358. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 358 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

359. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 360 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE SEVENTH CAUSE OF ACTION**

360. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

361. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 361 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

362. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 362 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

363. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 363 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

364. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 364 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

365. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 365 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

366. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 366 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE EIGHTH CAUSE OF ACTION**

367. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

368. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 368 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

369. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 369 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

370. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 370 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

371. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 371 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

372. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 372 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

373. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 373 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

374. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 374 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE NINTH CAUSE OF ACTION**

375. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

376. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 376 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

377. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 377 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

378. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 378 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

379. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 379 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

380. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 380 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

381. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 381 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE TENTH CAUSE OF ACTION**

382. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

383. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 383 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

384. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 384 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

385. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 385 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

386. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 386 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

387. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 387 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE ELEVENTH CAUSE OF ACTION**

388. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

389. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 389 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

390. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 390 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

391. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 391 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

392. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 392 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.



393. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 393 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

394. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 394 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

395. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 395 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE TWELFTH CAUSE OF ACTION**

396. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

397. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 397 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

398. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 398 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

399. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 399 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

400. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 400 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

401. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 401 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

402. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 402 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE THIRTEENTH CAUSE OF ACTION**

403. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

404. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 404 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

405. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 405 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

406. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 406 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

407. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 407 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

408. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 408 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE FOURTEENTH CAUSE OF ACTION**

409. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

410. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 410 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

411. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 411 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

412. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 412 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

413. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 413 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

414. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 414 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

415. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 415 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

416. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 416 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE FIFTEENTH CAUSE OF ACTION**

417. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

418. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 418 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

419. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 419 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

420. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 420 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

421. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 421 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

422. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 422 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

423. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 423 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE SIXTEENTH CAUSE OF ACTION**

424. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

425. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 425 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

426. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 426 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

427. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 427 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

428. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 428 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

429. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 429 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE SEVENTEENTH CAUSE OF ACTION**

430. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

431. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 431 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

432. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 432 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

433. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 433 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

434. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 434 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

435. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 435 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

436. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 436 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

437. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 437 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE EIGHTEENTH CAUSE OF ACTION**

438. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

439. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 439 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

440. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 440 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

441. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 441 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

442. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 392 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

443. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 443 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

444. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 444 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE NINETEENTH CAUSE OF ACTION**

445. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this Answer with the same force and effect as if fully set forth at length herein.

446. Deny knowledge and information sufficient to form a belief as to the allegations in Paragraph 446 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

447. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 447 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

448. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 448 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

449. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 449 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

450. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 450 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE TWENTIETH CAUSE OF ACTION**

451. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

452. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 452 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

453. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 453 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

454. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 454 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

455. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 455 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

456. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 456 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

457. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 457 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

458. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 458 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE TWENTY-FIRST CAUSE OF ACTION**

459. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

460. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 460 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

461. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 461 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

462. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 462 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

463. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 463 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

464. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 464 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.



465. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 465 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

466. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 466 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

467. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 467 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

**ANSWERING THE TWENTY-SECOND CAUSE OF ACTION**

468. Defendants repeat and reallege their responses set forth in all prior Paragraphs of this

Answer with the same force and effect as if fully set forth at length herein.

469. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 369 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

470. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 370 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

471. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 471 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

472. Deny knowledge and information sufficient to form a belief as to the allegations in

Paragraph 472 of the Complaint, except to the extent said allegations refer to the Defendants, to which extent they are hereby denied.

473. Deny knowledge or information sufficient to form a belief as to the allegations in

Paragraph 473 of the Complaint.

**JURY DEMAND**

474. Neither admit nor deny the allegations contained in Paragraph 474 of the Complaint but refer this allegation to the Court for its determination of the allegations thereof as a matter of law.

**FIRST AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint fails to state a claim upon which relief may be granted.

**SECOND AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the Statute of Frauds.

**THIRD AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the Statute of Limitation or otherwise untimely under New York No-fault Insurance Regulations.

**FOURTH AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the doctrine of unclean hands.

**FIFTH AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the doctrine of equitable estoppel.

**SIXTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of *res judicata*.

**SEVENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of collateral estoppel.

**EIGHTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of claim preclusion.

**NINETH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of issue preclusion.

**TENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery for lack of privity.

**ELEVENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery as they have failed to satisfy a necessary jurisdictional prerequisite.

**TWELFTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery by the doctrine of waiver.

**THIRTEENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery by the doctrine of offer and compromise.

**FOURTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, due to a failure to mitigate damages.

**FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to plead its claims of fraud with the requisite particularity.

**SIXTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by the *in pari delicto* doctrine.

**SEVENTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by prior actions pending.

**EIGHTEENTH AFFIRMATIVE DEFENSE**

The claims for which Plaintiffs seek declaratory judgment are subject to Defendants' right to arbitrate pursuant to the Federal Arbitration Act and New York law, which right Defendants hereby demand.

**NINETEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims of fraud are barred by a lack of reasonable and/or justifiable reliance.

**TWENTIETH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by the doctrine of, and public policy favoring, finality of settlements.

**TWENTY-FIRST AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by Plaintiffs' unjust enrichment.

**TWENTY-SECOND AFFIRMATIVE DEFENSE**

The claims for which Plaintiffs seek declaratory judgment, to the extent such request for relief is based upon allegations of fraudulent incorporation, are barred by Plaintiffs' failure to timely raise them.

**TWENTY-THIRD AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, because to the extent Plaintiffs suffered any injury or incurred any damages as alleged in the Complaint, which Defendants deny, any such injury or damage was caused, in whole or in part, by intervening or superseding events, factors, occurrences, conditions or acts, over which Defendants had no control, or through acts or omissions on the part of Plaintiffs.

**TWENTY-FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred to the extent they seek relief based upon allegations of fee-splitting, as such is not a proper basis for denial of payment of claims for reimbursement of services performed pursuant to New York No-Fault Law.

**TWENTY-FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed and refused to avail itself of the New York State Courts to vacate or otherwise challenge settlements or judgments which arose from New York State Court proceedings and are therefore precluded from seeking to do so herein.

**TWENTY-SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by Plaintiffs' forum shopping.

**TWENTY-SEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' instant claims constitute an impermissible collateral attack on previously rendered New York State Court decisions and/or judgments and are therefore barred.

**TWENTY-EIGHTH AFFIRMATIVE DEFENSE**

To the extent Plaintiffs' request for relief is based upon allegations of fraudulent incorporation, such allegations are inapplicable to individual health care practitioners billing under their own T.I.N. number.

Dated: New York, New York  
January 5, 2023

LAW OFFICES OF MARK L. FURMAN  
*/s/ Mark L. Furman*

By: \_\_\_\_\_  
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